

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA) Case No: 2:19-cr-00013
v.) Chief Judge Crenshaw
GEORGIANNA A.M. GIAMPIETRO)

JOINTLY PROPOSED STATEMENT OF THE CASE

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorneys for the Middle District of Tennessee and the Trial Attorney for the Counterterrorism Section of the Department of Justice, and with the agreement of defense counsel, as evidenced by the signatures below, hereby submits the following jointly proposed statement of the case.

In this criminal case, the defendant is charged in a four-count Indictment. Count One charges that beginning on or about November 24, 2017, and continuing through on or about October 23, 2018, the defendant knowingly attempted to provide material support and resources, to wit: personnel and services, to a foreign terrorist organization, namely, the Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, aliases for Al-Nusrah Front, knowing that the organization was a designated foreign terrorist organization and knowing that the organization had engaged in, and engages in, terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).

Count Two charges that beginning in or about May 2018, and continuing through in or about June 2018, the defendant knowingly attempted to provide material support and resources, to wit: currency, to a foreign terrorist organization, namely, the Hay'at Tahrir, also known as Hay'et Tahrir al-Sham, also known as Hayat Tahrir al-Sham, also known as HTS, aliases for Al-Nusrah Front, knowing that the organization was a designated foreign terrorist organization and knowing

that the organization had engaged in, and engages in, terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).

Count Three charges that between March 2018 and on or about October 23, 2018, the defendant knowingly altered, destroyed, concealed, and covered up a record or document, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, a department and agency of the United States, that is, a possible violation of Title 18, United States Code, Section 2339B(a)(1), in violation of Title 18, United States Code, Section 1519.

Count Four charges that between on or about September 23, 2018, and on or about October 23, 2018, the defendant knowingly and corruptly did alter, destroy, and conceal a record and document, including, but not limited to, contact information, text messages, electronic communications, and a cell phone, and corruptly did attempt to do so, with the intent to impair the record and document's integrity and availability for use in an official proceeding, namely, a grand jury investigation into a possible violation of Title 18, United States Code, Section 2339B(a)(1), in violation of Title 18, United States Code, 1512(c)(1).

The defendant has pleaded not guilty to each of these charges.

Respectfully submitted,

MARK H. WILDASIN
Acting United States Attorney
Middle District of Tennessee

/s *Philip H. Wehby*
Philip H. Wehby
Kathryn Risinger
Assistant United States Attorneys
110 Ninth Avenue South, Suite A-961
Nashville, Tennessee 37203-3870
Telephone: (615) 736-5151

/s *Jennifer E. Levy*
JENNIFER E. LEVY
Trial Attorney
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Phone: (202) 514-1092

Approved for Entry:

/s *Charles D. Swift*
CHARLES D. SWIFT
Pro Hac Vice Attorney for Georgiana Giampietro
Constitutional Law Center for Muslims in America
100 N. Central Expy, 1010
Richardson, TX 75080
Phone: (972) 914-2504